A guide to making claims in relation to the Sustainable Golf Development Voluntary Sustainability Standard¹

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Foreword

This document is intended to guide project teams that have used the Sustainable Golf Development Voluntary Sustainability Standard (VSS) on the kinds of claims they can make about their project. By following this guide, a project team can confidentially and accurately communicate the achievements of their work. The type of claim able to be made is dependent on the way in which the project has chosen to use the VSS. Full details of the VSS and the ways in which it can be applied to a project can be found at http://www.golfenvironment.org/get_involved/developments/sustainable_golf_development_standard

For any clarifications, the claim-makers are able to get in touch with:
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A. Definitions²

*Sustainable*
The word ‘sustainable’ (or sustainably, sustainability, etc.) on its own refers to all three of the generally accepted pillars of sustainability – environment, economic, social.

*Good Practice*
The demonstration of fairly high level of performance is generally accepted as good practice.

*Worst Practice*
The worst forms of practice such as child labour.

*Certified*
Refers to the use of third-party audit that assess conformance and results. Typically, a certificate is issued.

*Sustainability Claim*
A message used to set apart and promote a product, process, business or service with reference to the word ‘sustainable’.

*Assured Claim*
An assured claim usually contains a combination of logo and text claim.

Typically, an assured claim will also include a web link to additional information. Any assured claim made should have a structure that includes the subject of the claim; the traceability information; the achievement and the subject of the VSS. For example:

“Happy Valley Golf Facility has been awarded the GEO Certified® Development mark, which means, it has met the Sustainable Golf Development Voluntary Sustainability Standard. View their achievements at golfenvironment.org/happyvalley”

See Figure 1 below for an example of a communication that could be used to support an assured claim.

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² Taken from ISEAL’s ‘Sustainability Claims Good Practice Guide’ as referenced above.
Figure 1. Components of an assured claim communication
B. Types of Claims

Broad Landscape of General Sustainability Claims

Within the realm of sustainability claims there is a sub-set related directly to sustainability standards known as controlled claims. This guide focuses on controlled claims for users of the Sustainable Golf Development Voluntary Sustainability Standard (VSS).

What is a Controlled Claim?

A claim that is directly linked to any kind of standards system and it requires some sort of approval for use. Controlled claims include ‘assured claims’ and ‘marketing claims’. Refer to Figure 2 below.

**Assured Claim:** Results from an assured assessment\(^3\) against a standard. It’s used for claims regarding a certified product, process, business or service in compliance with a standard. A complete assured claim is typically considered as a combination of:

- Logo
- Text claim, and
- Access to further information

**Marketing Claim:** Used to promote an aspect of or relationship with a standards system. Can overlap with assured claim when it refers to certification.

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\(^3\) A controlled process of independent verification, review and decision that stipulates specific requirements are fulfilled.
**Type of Claims – Decision Flow Chart**

Use the flow chart below to decide which controlled claim applies to you and your project and where to find more information on the type of claim for you.

1. **Did I use the Sustainable Golf Development Voluntary Sustainability Standard?**
   - Yes
     - Self Declaration Claim
     - Self Assessed Claim
     - Peer Reviewed Claim
     - Third-party Certified Claim
   - No
     - No Claim

2. **Did we collect our supporting documents during the project works?**
   - Yes
     - Self Assessed Claim
     - Peer Reviewed Claim
     - Third-party Certified Claim
   - No
     - Self Declaration Claim
     - Go to page 8

3. **Did anybody else look at our supporting documents during or after the project works?**
   - Yes
     - Peer Reviewed Claim
     - Third-party Certified Claim
   - No
     - Self Assessed Claim
     - Go to page 9

4. **Did an assured verifier look at our supporting documents during and after the project works?**
   - Yes
     - Third-party Certified Claim
     - Go to page 11
   - No
     - Peer Reviewed Claim
     - Go to page 10
A project that has used the Voluntary Sustainability Standard
For a project that uses the VSS without independent assessment there are three types of possible marketing claims 1. Self-Declared, 2. Self-Assessed and 3. Peer Reviewed.

1. Self-Declared model

   Characteristics
   
   Entitles a project to meet the baseline criteria of the VSS, but not to provide evidence.

   Recommended claims wording on business cards, websites, leaflets etc.

   Pre-development
   
   “Happy Valley Ltd is committed to creating a golf course in line with the Sustainable Golf Development Voluntary Sustainability Standard.”

   Post-development
   
   “Happy Valley Ltd are proud to have created a golf course in line with the Sustainable Golf Development Voluntary Sustainability Standard.”

   Words allowed
   
   ‘in-line with’
   ‘in accordance with’
   ‘following’
   ‘guided by’

   Words not allowed
   
   ‘Independently verified’
   ‘Certified’
   ‘Meets requirements’ (vague)
   ‘Guarantees sustainable practices’
2. Self-Assessed model

Characteristics
Entitles a project to provide their own evidence about how they meet the baseline criteria of the VSS.

Recommended claims wording on business cards, websites, leaflets etc.
“Happy Valley Ltd demonstrated how they created a golf course in line with the Sustainable Golf Development Voluntary Sustainability Standard through the support and reporting of their design team.…” Ideally a web link to evidence is provided to support this claim.

Words allowed
‘recorded’
‘reported’
‘followed’

Words not allowed
‘Independently verified’
‘Certified’
‘Guarantees sustainable practices’
‘Assured’
3. Peer Reviewed model

Characteristics

Another golf facility, in development, reviews the project being assessed for compliance against the baseline criteria of the VSS.

To qualify as being a ‘peer’ the reviewing development must itself be able to theoretically be assessed against the VSS.

Recommended claims wording on business cards, websites, leaflets etc.

“Happy Valley Golf Facility has been assessed by its peers and found to meet the Sustainable Golf Development Voluntary Sustainability Standard.”

Words allowed

'reviewed'
'assessed'
'meets the'

Words not allowed

‘Third-party certified’
‘Guarantees sustainable practices’
A project that has used the Voluntary Sustainability Standard and an GEO Certification Ltd. Assured Verifier

For a project that uses the VSS and a GEO Certification Ltd. assured verifier\(^4\) to assess their project they can make an ‘assured claim’\(^6\) or ‘4. Third Party Certified’ type claim.

4. Third-party certified model

Characteristics
An assessment carried out by a party that is not related to the golf facility being assessed.

Recommended claims wording on business cards, websites, leaflets etc.\(^7\)
“Happy Valley Golf Facility has been independently assessed and found to meet the Sustainable Golf Development Voluntary Sustainability Standard.”

“Happy Valley Golf Facility has been certified against the Sustainable Golf Development Voluntary Sustainability Standard by a third-party verifier.”

“Our golf facility is certified for responsible golf development practices”
When writing an assured claim make sure it is as easy as possible to understand. If unsure contact GEO Certification Ltd. for clarification.

Words allowed
‘Responsible’
‘More sustainable’
‘Well managed / designed / built’
‘Independently verified’
‘Assured’

Words not allowed
‘Guarantees sustainable practices’

For further support and guidance feel free to consult the International Social and Environmental Accreditation and Labelling (ISEAL) Alliance’s 10 Credibility Principles, which can be found at [http://www.isealalliance.org/our-work/defining-credibility/credibility-principles](http://www.isealalliance.org/our-work/defining-credibility/credibility-principles). A list of the 5 principles that apply to claims is annexed at the end of this document for convenience (See Annex A).

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\(^4\) A full list of assured verifiers can be found at [http://www.golfenvironment.org/about/support_network](http://www.golfenvironment.org/about/support_network)

\(^6\) See “Section B: Types of Claims” for details.

\(^7\) All claims made in association with the OnCourse Developments programme will be written and considered on a case-by-case basis.
C. Rules for Applying Claims

Any golf facility that has used the VSS to inform their project has the ability to make a claim⁸.

Golf facilities that have sought assessment through a third-party verifier can make different claims from those who have opted not to seek independent assessment.

To be eligible to make an assured claim the golf facility must have met or are planning to meet the ‘baseline’ criteria of the VSS and be independently assessed.

The GEO Certified® status is a protected phrase and can only be used with the approval of GEO Certification Ltd.

GEO Certification Ltd. will be responsible for monitoring the use of all claims relating to the VSS and will investigate fraudulent use of the certified logo, associated claims to that logo or the phrase GEO Certified®.

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⁸ Claim maker can be those individuals or organizations that were involved in the creation of the golf project in question. If you are unsure if you are able to make a claim get in touch with GEO Certification Ltd. for clarification.
D. Characteristics of the Sustainable Golf Development Voluntary Sustainability Standard (VSS)³

The VSS:

- Does not permit any of the generally accepted ‘worst practices’.
- Requires a performance generally accepted as ‘good practice’.
- Requires all the ‘baseline’ criteria to be met.

For the full version of the Sustainable Golf Development Voluntary Sustainability Standard and ways it can be applied to projects see:

http://www.golfenvironment.org/get_involved/developments/sustainable_golf_development_standard

³ See Annex D of ISEAL’s ‘Sustainability Claims Good Practice Guide’ as referenced above for further explanation of characteristics of a ‘good practice’ standard.
**Annex A**

Below are the 5 principles that apply to claims as an excerpt from the ISEAL Alliance’s “Credibility Principles – What’s essential for a standards system to deliver positive impact?”. A copy of this can be found online at:


<table>
<thead>
<tr>
<th>Credibility Principle</th>
<th>Relation to Claims and Traceability</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>3. Relevance</strong></td>
<td>Standards are fit for purpose. They address the most significant sustainability impacts of a product, process, business or service; only include requirements that contribute to their objectives; reflect best scientific understanding and relevant international norms; and are adapted where necessary to local conditions.</td>
</tr>
<tr>
<td></td>
<td>Claims relate to the content of the standard and do not claim to achieve more than the standard requires.</td>
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<td><strong>4. Rigour</strong></td>
<td>All components of a standards system are structured to deliver quality outcomes. In particular, standards are set at a performance level that results in measurable progress towards the scheme’s sustainability objectives, while assessments of compliance provide an accurate picture of whether an entity meets the standard’s requirements.</td>
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<td></td>
<td>Scheme owners control the claims made by participants in their systems and have appropriate traceability systems in place. Product-related claims can be traced back to certified operations.</td>
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<td><strong>7. Transparency</strong></td>
<td>Standards systems make relevant information freely available about the development and content of the standard, how the system is governed, who is evaluated and under what process, impact information and the various ways in which stakeholders can engage.</td>
</tr>
<tr>
<td></td>
<td>Information that substantiates claims is made available to interested parties, including information about product-specific claims and the traceability systems that support these claims.</td>
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<tr>
<td><strong>8. Accessibility</strong></td>
<td>To reduce barriers to implementation, standards systems minimise costs and overly burdensome requirements. They facilitate access to information about meeting the standard, training, and financial resources to build capacity throughout supply chains and for actors within the standards system.</td>
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<tr>
<td></td>
<td>Costs for using labels or making claims are not prohibitive. The traceability process is no more onerous than necessary to support the associated claim.</td>
</tr>
<tr>
<td><strong>9. Truthfulness</strong></td>
<td>Claims and communications made by actors within standards systems and by certified entities about the benefits or impacts that derive from the system or from the purchase or use of a certified product or service are verifiable, not misleading, and enable an informed choice.</td>
</tr>
<tr>
<td></td>
<td>All claims made about the standards system are accurate and can be substantiated, whether they are on-product claims or otherwise. Claims are easy to understand, avoid overstating the benefits resulting from the standards system and are accurate and precise in their language. Claims are comparable, or at least provide comparable data. While claims cannot convey all the relevant details about a certified product or service, they provide sufficient information to be verified, either directly or through links to websites or other sources of information. Claims related to product origin (such as through on-product labels about production practices) will have a traceability system in place suitable for the type of supply chain and claim being made. As appropriate, these include product tracking through the supply chain (product origin claims), mixing of certified and non-certified product (‘contributes to/supports’ or percentage-based claims), or trading volume certificates separately from the certified product (‘contributes to/supports’ type claims).</td>
</tr>
</tbody>
</table>
Disclaimer

This document has focused on the aspects of controlled claims as defined in Section B of this document. GEO Certification Ltd reserves the right not to stand by claims made about the VSS that do not comply with this guidance document or have not sought approval from GEO Certification Ltd prior to publishing.

GEO Certification Ltd takes no responsibility for the legal implications of the use of this guide, and does not claim that following this guide will result in legal compliance. The guidance given here is not intended as a substitute for legal advice.